

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

COALITION FOR TJ,

Plaintiff,

v.

FAIRFAX COUNTY SCHOOL BOARD;
and DR. SCOTT BRABRAND, in his official
capacity as Superintendent of the Fairfax
County School Board,

No. 1:21-cv-00296-CMH-JFA

Defendants.

DECLARATION OF ASRA Q. NOMANI

I, Asra Q. Nomani, declare as follows:

1. The facts set forth in this declaration are based on my knowledge and, if called as a witness, I can competently testify to their truth under oath. As to those matters that reflect a matter of opinion, they reflect my personal opinion and judgment upon the matter.
2. I am an Asian-American resident of Fairfax County, Virginia.
3. I am the parent of a student at Thomas Jefferson High School for Science and Technology (TJ) in Alexandria, Virginia.
4. I am an investigative journalist, former Wall Street Journal reporter, and current Vice-President for Strategy and Investigations at Parents Defending Education.
5. In August 2020, I co-founded the Coalition for TJ with Glenn Miller in response to threats from the Fairfax County School Board and Virginia Secretary of Education Atif Qarni

that changes would be made to the TJ admissions process that I believed would discriminate against Asian-American applicants.

6. The Coalition for TJ is a membership organization.
7. The Coalition supports increasing diversity through merit-based admissions to TJ.
8. The Coalition has three tiers of membership: a leadership team, a core team, and general members.
9. The leadership team is comprised of 10 members and meets weekly to discuss strategy and Coalition business.
10. I am a member of the leadership team.
11. The leadership team was chosen through self-nominations, and nominees were then chosen by consensus.
12. The core team is comprised of 27 members who join the weekly leadership meeting and contribute to the operational activities of the organization.
13. The general membership tier currently has 298 members.
14. The Coalition also has approximately 5,000 supporters, who are not traditional members but who sign petitions, attend virtual or in-person rallies, or otherwise contribute to the Coalition's mission.
15. The Coalition has eight committees, which are led by parent leaders.
16. The committees are: Fundraising, Accounting/Finances, Membership, Media and Communications, Advocacy, Legal, Operational Management, and Data.

17. To become a member, interested individuals must fill out a membership application form on the “Contact Us” tab of the Coalition for TJ website at www.coalitionfortj.net.

18. The website form asks for the individual’s name, email address, and where they heard about the Coalition for TJ. It also asks the individual to share his or her personal story about “why the issue of advocating for diversity and excellence is important to you” and what programs he or she is interested in working with.

19. Application forms are then vetted by the Coalition to ensure the applicant shares the same interest in fighting the discriminatory TJ admissions policy changes.

20. Coalition members communicate through Telegram, which is a mobile social networking application that enables group messaging and communications.

21. The Coalition maintains a Telegram group open to all members, where members, committees, the core team, and the leadership team communicate with each other.

22. The Coalition maintains a Telegram group for core team members.

23. The Coalition maintains Telegram groups only for committee members.

24. Coalition members can, and frequently do, raise concerns and ideas with leadership via the Telegram group.

25. A few Coalition members have resigned their membership when they felt their views no longer aligned with the mission of the Coalition.

26. The Coalition does not have bylaws.

27. Coalition members do not pay dues, and the Coalition is not a fundraising organization.

28. On or about November 30, 2020, the Coalition became a Fiscally Sponsored Program (FSP) of United Charitable, a nonprofit organization that assists other nonprofit organizations with administration and compliance requirements.

29. United Charitable's policies do not permit FSPs to engage in litigation.

30. To comply with United Charitable's policies, the Coalition separated itself from United Charitable, creating the Coalition for Truth and Justice to participate as a FSP of United Charitable.

31. The Coalition for Truth and Justice is a parallel organization to the Coalition for TJ, but has a broader scope encompassing more than just TJ. Specifically, the mission of the Coalition for Truth and Justice is "to conduct original research, journalism, and advocacy about significant public issues relegated to education, contribute to sound public policy decisions and protect gifted and STEM education and the legal defense of the rights of students."

32. Those wishing to financially contribute are encouraged by the Coalition's website to make a tax-deductible donation to the Coalition for Truth and Justice, which it describes as a program of 501(c)(3) United Charitable.

33. The Coalition was formed in opposition to a specific problem: the discriminatory changes to the admissions process at TJ.

34. I am not aware of any Coalition member who supports the discriminatory changes to the admissions process at TJ.

35. I do not believe anyone would join the Coalition for TJ unless they opposed the admissions changes.

36. A different group—the TJ Alumni Action Group—exists to support the changes to the TJ admissions process.

37. The TJ Alumni Action Group has opposed the Coalition’s work at every turn.

38. On August 14, 2020, the president of the TJ Alumni Action Group, Makya Renee Little, and Marea Corporation, a graphic design company owned by Ms. Little, purchased the URLs www.coalitionfortj.org, www.coalitionfortj.com, www.coalition4tj.org, and coalition4tj.com and had the websites hyperlinked to her organization website, www.tjaag.org, which featured a donate button that misled some donors into contributing funds to the TJ Alumni Action Group instead of the Coalition for TJ.

39. The TJ Alumni Action Group has received public support from Board Chair Ricardy Anderson and Board Member Karen Keys-Gamara.

40. Members of the TJ Alumni Action Group have published op-eds and other media pieces supporting the TJ admissions changes.

41. I do not believe it is likely that an individual who supports the TJ admissions policy changes would mistakenly join the Coalition for TJ instead of the TJ Alumni Action Group.

42. Coalition members, including myself, express their views through attending virtual and in-person rallies, providing public comments at school board meetings, work sessions, and town hall meetings, writing op-eds, and engaging on social media.

43. The Coalition was formed in the midst of the COVID-19 pandemic and was obligated to hold many of its activities and member engagement virtually for reasons of safety and compliance with local regulations.

44. Virtual Coalition events included: an Oct. 4, 2020, rally to save TJ with about 200 people attending; a Nov. 30, 2020, webinar, “The Importance of Thomas Jefferson High School for Science and Technology as a Catalyst for Growth in Northern Virginia,” organized with the Thomas Jefferson Institute for Public Policy with 235 participants; and regular online educational seminars with local parents and community members.

45. In-person Coalition events included: a Sept. 20, 2020, protest against the planned changes to TJ’s admissions policy, with about 200 students, parents, and community members outside the school in Alexandria, Va.; a Sept. 24, 2020, protest and “TJ Citizens Town Hall” at FCPS headquarters in Falls Church, Va., with about 100 students, parents, and community members; and an Oct. 18, 2020, “Memorial Service” and “Vigil” for TJ outside the school in Alexandria, Va., with about 100 students, parents, and community members attention to express their love for TJ.

46. The Coalition chose to bring this lawsuit because its members believed that the changes to the TJ admissions process violated the Equal Protection rights of Asian-American students.

47. The decision to file the lawsuit was made by the leadership team and core team through unanimous consent.

* * *

I declare under penalty of perjury that the foregoing is true and correct. Executed on this
12th day of May, 2021, at Great Falls, Virginia.

Asra Nomani

Asra Q. Nomani